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1	UNITED STATES DISTRICT COURT	1	I N D E X
2	FOR THE SOUTHERN DISTRICT OF TEXAS	2	
3	-----	3	EXAMINATION
4	KAREN TAYLOR,	4	Mr. Vickery
5	Plaintiff,	5	Mr. Glas
6	vs.	6	
7	TASER INTERNATIONAL, INC.,	7	EXHIBITS
8	Defendant.	8	(None)
9	-----	9	
10		10	
11		11	
12	VIDEO DEPOSITION OF	12	
13	JEFFREY HO, M.D., FACEP, FAAEM	13	
14		14	
15	March 21, 2018	15	
16		16	
17	9:15 a.m.	17	
18		18	
19	Paradigm Reporting	19	
20	527 Marquette Avenue South, Suite 1400	20	
21	Minneapolis, Minnesota	21	
22		22	
23		23	
24		24	
25	Reporter: Lisa Peterson	25	
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1	A P P E A R A N C E S	1	VIDEOGRAPHER: We are on the record.
2		2	Here begins tape one in the deposition of Jeffrey D.
3	For Plaintiff:	3	Ho, M.D., in the matter of Karen Taylor versus Taser
4	(via videoconference)	4	International, Incorporated.
5	VICKERY & SHEPHERD	5	Today's date is March 21, 2018. The
6	10000 Memorial Drive, Suite 750	6	time is now 9:15 a.m. The video operator is Adam
7	Houston, Texas 77024	7	Wallin of Paradigm Digital Videography.
8	By: ARNOLD ANDERSON VICKERY, ESQ.	8	Would Counsel please identify themselves
9	andy@justiceseekers.com	9	and state whom they represent.
10		10	MR. VICKERY: My name is Andy Vickery.
11	For Defendant:	11	I'm from Houston, Texas, although today I'm in
12	DEUTSCH KERRIGAN	12	Charlotte, North Carolina, and I represent the
13	755 Magazine Street	13	plaintiff Karen Taylor.
14	New Orleans, Louisiana 70130	14	MR. GLAS: My name is Jerry Glas, and I
15	By: JOHN JERRY GLAS, ESQ.	15	am here in Minneapolis, Minnesota, and I represent
16	jerry@deutschkerrigan.com	16	Axon Enterprise, Incorporated, formerly known as
17		17	Taser International, Incorporated.
18	Also present:	18	VIDEOGRAPHER: The court reporter
19	Adam Wallin, Videographer	19	today is Lisa Peterson of Paradigm Reporting &
20		20	Captioning. Would the reporter please swear in the
21		21	witness.
22		22	JEFFREY HO, M.D., FACEP, FAAEM,
23		23	being first duly sworn,
24		24	testified as follows:
25		25	o0o

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1	city?	1 BY MR. VICKERY:
2	A. I was just getting off an airplane in	2 Q. What is?
3	Arizona.	3 A. I don't think there is a single most
4	Q. Were you asked to make recommendations	4 important. I think it's multi-factorial.
5	as to what should be done so this would not happen	5 Q. List the factors for me?
6	again?	6 A. Again multi-factorial meaning it can
7	A. Not specifically. We were asked to	7 have to do with things such as where on the body the
8	describe what had just occurred. We were asked to	8 location of the darts are occurring, it can have to
9	come up with reasons why we felt like it occurred	9 do with charge being one of them which you just
10	and the different parameters, and this was in	10 mentioned, pulse duration is another shape of the
11	combination with talking with the engineers and	11 charge, the body habitus of the individual and
12	whatnot, and then the company made decisions based	12 resistance that the current is meeting.
13	off that.	13 So again simply saying it's only one
14	Q. The decision they made was to lower the	14 thing is the most important thing I think is an
15	charge output, wasn't it?	15 over-simplification. While I won't dispute that
16	A. I think that was one of the decisions.	16 Rick Smith may have said that or did say that, I
17	You would have to ask them specifically on that.	17 don't necessarily agree with that.
18	Q. Can you tell me from what it was lowered	18 Q. Mark Kroll said it in a peer-reviewed
19	to what, in other words, how much was it lowered?	19 article more than ten years ago, didn't he?
20	A. I couldn't. I don't know what we	20 A. If you have it in front of you, you are
21	started at.	21 telling me that, I wouldn't disagree with you on
22	Q. Can you tell me what the charge output	22 that.
23	of the X3 was once the modifications had been made?	23 Q. You wouldn't disagree with Mark Kroll on
24	A. I believe on the spec sheet now it is	24 that, would you?
25	represented as 63 microcoulombs of average charge.	25 A. If you are telling me he said the exact
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1	Q. That is the same wave form and same	1 same statement in that context, yes, I would
2	charge as the X2, right?	2 disagree with you on that. Maybe I didn't
3	MR. GLAS: Object. Compound question.	3 understand your question.
4	BY MR. VICKERY:	4 Q. I'm not trying to quote Dr. Kroll. What
5	Q. Is it the same wave form as the X2?	5 I'm saying is Dr. Kroll in a published article at
6	A. That is what I'm under the impression	6 least eight years ago, I think ten, I could dig it
7	of, yes.	7 out if I had to and I will for the trial but that
8	Q. Is it the same charge output as the X2?	8 Dr. Kroll echoed what Mr. Smith said about the key
9	A. That I believe so, yes.	9 focus from the standpoint of achieving neuromuscular
10	Q. Did you see the quote in my amended	10 incapacitation in design and function of the weapon
11	complaint attributed to Rick Smith that when we are	11 is the output of charge?
12	looking at the question of neuromuscular	12 MR. GLAS: Mr. Vickery, I don't
13	incapacitation, that the total delivered charge is	13 understand if you are asking him to confirm Mark
14	the, quote, key thing we focus on?	14 Kroll said it or whether he today agrees that -- I'm
15	A. I must have seen it if that document was	15 not sure what you are asking. You keep saying the
16	given to me, and I'm sure I saw it.	16 same statement he said it but there's no question
17	Q. You agree with that, don't you?	17 after it. I apologize for interrupting you. I
18	A. Not necessarily. I don't agree with	18 think the witness was confused about the same
19	that as a single isolated statement, no.	19 thing.
20	Q. You don't think the charge output is the	20 BY MR. VICKERY:
21	single most important parameter for determining	21 Q. I'm asking if you agreed with the
22	neuromuscular incapacitation?	22 peer-reviewed published literature by Dr. Kroll that
23	MR. GLAS: Objection. Asked and	23 echoed Mr. Smith's comments about charge being the
24	answered.	24 key component in terms of achieving neuromuscular
25	A. No, I don't.	25 incapacitation? If Mark Kroll said that, do you

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1 REPORTER CERTIFICATE

2 BE IT KNOWN, I took the video deposition of
3 JEFFREY HO, M.D., FACEP, FAAEM, at the time and
place set forth herein;4 That I was then and there a Notary Public in
5 and for the County of Hennepin, State of Minnesota
and by virtue thereof I was duly authorized to
administer an oath;7 That the witness before testifying was by me
first duly sworn to testify to the whole truth
8 relative to said cause;9 That the testimony of said witness was
recorded in shorthand and transcribed into
10 typewriting, and that the deposition is a true
record of the testimony given by the witness, to the
best of my ability;12 That before completion of the deposition,
review of the transcript was requested. If
13 requested, any changes made by the deponent (and
provided to the reporter) during the period allowed
14 are appended hereto.15 That I am not related to any of the parties
hereto nor interested in the outcome of the action;16 That the original transcript was charged and
delivered to attorney conducting the deposition for
17 filing, that copies were charged at the same rate;19 WITNESS MY HAND AND SEAL THIS
24TH DAY OF MARCH 2018.22 -----
23 LISA M. PETERSON
My commission expires 1/31/22